

Jackson, Mississippi 39206
Email: Trent@Trentwalkeresq.com
(Mississippi Local Counsel)
(601) 321-9540

EXHIBIT A

Fwd: ADMISSIONS TO DEFENDANTS. 3:23-cv-374-ASH-DPJ :

From: Malik Shabazz (attorney.shabazz@yahoo.com)
To: cleland@bellsouth.net
Cc: trent@trentwalkeresq.com; attorney.shabazz@yahoo.com
Bcc: lattlaw@gmail.com
Date: Wednesday, February 26, 2025 at 11:50 PM GMT-4

Dear Counsel Leland:

We are seeking your consent for our upcoming Motion to have our Requests for Admissions to Jeffery Middleton deemed admitted.

Will you consent to our motion?

Sincerely,

Malik Z. Shabazz, Esq.
Attorney at Law
(301) 513-5445
(240) 688-0735
700 Pennsylvania Ave SE
Suite #200
Washington DC
20003

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

Begin forwarded message:

From: Malik Shabazz <attorney.shabazz@yahoo.com>
Date: December 4, 2024 at 12:49:13 AM AST
To: jdare@bislawyers.com, cleland@bellsouth.net
Cc: Trent Walker <trent@trentwalkeresq.com>, litigation.shabazz@yahoo.com
Subject: ADMISSIONS TO DEFENDANTS. 3:23-cv-374-ASH-DPJ :

Reply-To: Malik Shabazz <attorney.shabazz@yahoo.com>

Dear Counsel:

Enclosed are admissions that shall be served upon Defendants Elward, Middleton, Dedmon, Opdyke, and McAlpin.

Sincerely,

Malik Z. Shabazz Esq.
6305 Ivy Lane
Suite #608
Greenbelt, MD 20770
attorney.shabazz@yahoo.com
Ph: 301-513-5445
Fax: 301-513-5447



JENKINS ADMISSIONS DEDMON 12-3-24.pdf
138.2kB



JENKINS ADMISSIONS ELWARD 12-3-24.pdf
101.5kB



JENKINS ADMISSIONS MCALPIN 12-3-24.pdf
102kB



JENKINS ADMISSIONS MIDDLETON 12-3-24.pdf
101kB



JENKINS ADMISSIONS OPDYKE 12-3-24.pdf
101.7kB

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL COREY JENKINS, <i>et al</i>	:	
	:	
Plaintiffs,	:	
	:	Civil Action No.
v.	:	3:23-cv-374-ASH-DPJ
	:	
	:	
RANKIN COUNTY, MISSISSIPPI, <i>et al.</i>,	:	
	:	
Defendants.	:	

To: Name: JEFFERY ARWOOD MIDDLETON
Register Number: 71472-510
Located At: FCI Edgefield

PLAINTIFF’S REQUEST FOR ADMISSSIONS FROM DEFENDANT
JEFFERY MIDDLETON

Instructions

1. Please restate each request.
2. Respond “Admit” or “Deny” to each request.

Definitions

As used throughout these discovery items, the following terms have the following meanings:

1. “Date” shall mean the exact day, month, and year, referred to in the Complaint.

2. “Identify,” when referring to a document or other tangible things, means to state the type of document (e.g., letter, memo, contract, chart, tape recording, microfiche) or other means of identifying it and its author and originator and its date or dates and all recipients and their addresses and when and how you first became aware of it, and its present location or custodian. If any such document was, but is no longer, in your possession or subject to your control, state what disposition was made of it.

3. “Identify,” when used in reference to an oral communication, means to state the name of the speaker and each person spoken to or who otherwise heard the communication and the substance of such communication.

4. “Describe” means to provide a detailed, narrative and chronological history of the incidents or events inquired about, including but not necessarily limited to: 1) pertinent dates; 2) identification of persons involved; 3) identification of oral communications or reports made during or about information that is pertinent to this case; 4) identification of documents utilized, generated or concerning said incidents; 5) where; and 6) why.

5. “You” and “your” shall mean **JEFFERY MIDDLETON**

6. 36(a)(3) *Time to Respond; Effect of Not Responding*. A matter is admitted unless, within 30 days after being served, the party to whom the request is directed serves on the requesting party a written answer or objection addressed to the matter and signed by the party or its attorney

REQUEST FOR ADMISSIONS

1. The existence of the GOON SQUAD, and its coin logo, was well known to personnel at all levels in the Rankin County Sheriff’s Department including Sheriff Bailey. **Admit or Deny**

2. As a matter of routine, your actions as deputy sheriff's were not closely supervised by Sheriff Bailey. **Admit or Deny**
3. Instead of close supervision, Sheriff Bailey left us deputies to our own devices so long as crime was kept in check. **Admit or Deny**
4. As a member of the Goon Squad, I was expected to use whatever force was necessary to maintain law and order as I deemed appropriate. **Admit or Deny**
5. Members of the GOON SQUAD were not held accountable for using force or causing injuries to the people that they arrested or detained. **Admit or Deny**
6. The GOON SQUAD operated on the night shift because that is when we believed that criminals were more active and because our misdeeds would be less visible to the public.
Admit or Deny
7. We had a culture in the Sheriff's Office that rewarded aggressiveness, a take charge attitude and a willingness to do whatever needed to be done to achieve the goals sought. **Admit or Deny**
8. In the environment that existed in the Sheriff's Department, we were led to believe that no adverse action would be taken for alleged excessive force or constitutional violations while I was working on the GOON SQUAD. **Admit or Deny**

On behalf of Plaintiff

Respectfully submitted on 12/04/ 2024 by:

/s/MALIK SHABAZZ ESQ /S/
MALIK SHABAZZ, Esq.
The Law Office of Malik Shabazz, Esq.

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Tel: (301) 513-5445
Fax: (301) 513-5447
(Lead counsel for Plaintiff

/S/ TRENT WALKER ESQ /S/
TRENT WALKER, Esq.
The Law Offices of Trent Walker
M.S.B. #10475
5245 Keele Street
Suite A
Jackson, Mississippi
39206
Email: Trent@Trentwalkeresq.com
(Mississippi Local Counsel)
(601) 321-9540

CERTIFICATE OF SERVICE

I, the undersigned attorney, do certify that I have this date emailed a copy of this REQUEST FOR ADMISSIONS to the following attorneys of record:

s/ Malik Z. Shabazz, Esq.
12/04/24